

Exhibit B

1 In The United States District Court
2 For the District of South Carolina
3 Columbia Division
4 C.A. No. 3:14-cv-03577-CMC-KDW

6 AFRAAZ R. IRANI, MD,)
7 Plaintiff,)
8 vs.)
9 PALMETTO HEALTH; UNIVERSITY OF)
SOUTH CAROLINA SCHOOL OF MEDICINE;)
10 DAVID E. KOON, JR., MD, ETC.,)
JOHN J. WALSH, IV, MD, ETC.,)
11 Defendants.)
12)

13 DEPOSITION

14 WITNESS: AFRAAZ IRANI, MD

15 DATE: June 30, 2015

16 TIME: 9:00 a.m. - 7:05 p.m.

17 LOCATION: Ogletree Deakins
1320 Main Street
Columbia, South Carolina

18

19 TAKEN BY: Attorneys for the Defendants

20

21 REPORTED BY: KATHRYN J. LINDLER

23 COMPUSCRIPTS, INC.
Client Focused. Deadline Driven.
24 CHARLESTON COLUMBIA HILTON HEAD GREENVILLE MYRTLE BEACH

25 1-888-988-0086

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1 Q. When last year?

2 A. I believe September/November, that ballpark.

3 Q. You chose not to start it when you could have?

4 A. I was not able to start it in January because,
5 because they would not allow me to leave during mandatory
6 training sessions that you start with.

7 Q. You had mandatory training in January?

8 A. I don't know what month. I don't know when --

9 Q. When was your --

10 A. January through February.

11 Q. When was your proposed start date?

12 A. I think middle/end of January.

13 Q. Do you have any documentation on that?

14 A. It was a phone call from the McKinsey recruiter,
15 because I expressed to him that I would like to start at a
16 sooner date. He said we've opened up some slots, you can
17 get started sooner, is that something you would be
18 interested and I said absolutely, let me give you a call
19 back. I said A. can we get this depositions done so I can
20 move on with my life. And --

21 MR. ROTHSTEIN: Don't say what you and I talked
22 about.

23 MS. HELMS: I didn't realize he had shifted to
24 you.

25 A. Thank you. So, yes, based on that, whatever.

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1 So.

2 Q. You went to the company and asked to have your
3 start date moved?

4 A. I asked it to be moved back to the original start
5 date which was always scheduled for June -- I'm sorry,
6 July.

7 Q. But you had the ability to begin in January and
8 begin earning an income in January?

9 A. I was offered the ability to take that job if I
10 do not have any other commitments and would be willing to
11 commit 24/7.

12 Q. Who was that telephone conversation with?

13 A. I don't remember his name. It was a recruiter.

14 Q. Do you have any documentation of that telephone
15 conversation?

16 A. No.

17 Q. Was there anything else that prevented you from
18 going ahead and starting the job in January?

19 A. No, just my commitments to this -- get these
20 depositions done.

21 Q. Do you know whether or not we can do depositions
22 on a weekend?

23 A. I think you underestimate a few things, how much
24 preparation went into this and how emotionally trying this
25 is for me. I don't think I can do a deposition and be back

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1 at work Monday because of the preparation. Because each
2 time I go through this, how worked up it gets me, the
3 agony, it's not something that I can expect to perform my
4 best at a job.

5 Q. I'm asking you whether or not you know whether we
6 could schedule depositions for a weekend.

7 A. You know, I think -- if you were to ask me, I
8 would've said you would've complained, because I think you
9 had complained about depositions done before 9:00 so. So I
10 guess it's theoretically possible, but.

11 Q. Pardon me, what did you just say?

12 A. I think you had said depositions always start at
13 9:00 at the previous one with Dr. Voss. I don't know if
14 you recall. You don't like to start earlier than that, but
15 I don't know if you would be amenable to schedule a
16 weekend. I guess it's a possibility, but I don't have any
17 reason to think it can happen one day or another. I don't
18 know of any rules.

19 Q. Any other reasons other than what you've already
20 told me that would have prevented you from starting your
21 job in January of -- 2014? 2015?

22 A. 2015, this year, in late January.

23 Q. I believe you received a \$25,000 bonus, signing
24 bonus?

25 A. Correct.

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1 Q. When was that paid?

2 A. End of last year.

3 Q. Your salary will be what?

4 A. I think 140.

5 Q. You have the ability to earn any bonus?

6 A. First year there's no performance-based bonus.

7 Q. What will you be doing? Are there other bonuses?

8 When you said there's no performance-based bonus, are there
9 any other bonuses?

10 A. There's a standard I think sign on for like 7K.

11 Q. Standard what?

12 A. It's just like a standard bonus for 7K.

13 Q. Any other monies that may be paid to you during
14 your first year?

15 A. I don't believe so.

16 Q. Are you provided with insurance?

17 A. I hope so.

18 Q. You don't know?

19 A. I don't know. I haven't started yet. I haven't
20 gotten the benefits packet or anything.

21 Q. Where will you be working?

22 A. The Bay area.

23 Q. Who will you report to?

24 A. I don't know.

25 Q. Do you have an address for your employer?